



SRS Citizens Advisory Board

Old Radioactive Waste Burial Ground

Meeting Summary

September 29, 1999
Aiken Federal Building
Aiken, SC

The Citizens Advisory Board (CAB) Environmental Remediation and Waste Management (ERWM) Subcommittee Old Radioactive Waste Burial Ground (ORWBG) Focus Group met on Wednesday, September 29, 6:00 p.m. at the Aiken Federal Building, Aiken, S.C. The purpose of the meeting was to review the interim Action on the Southwest (SW) Plume, the CAB Recommendation 75 and consider the agency response and develop a path forward, status on the Corrective Measures Study/Feasibility Study (CMS/FS) comments and impacts, Resource Conservation and Recovery Act (RCRA) Permit Modifications, Proposed Plan, and the CAB Independent Scientific Peer Review (ISPR) status. Those in attendance were:

CAB

Karen Paterson, Admin. Lead

Stakeholders

Lee Poe, Tech. Lead

Todd Crawford

Bill McDonell

Michael Moore, DHEC

William Willoughby II

Jerry Devitt

Eugene Rollins

DOE/Contractors

Phillip Prather, DOE

Ed McNamee, BSRI

Don Toddings, BSRI

Mike Griffith, WSRC

Elmer Wilhite, WSRC

Sonny Goldston, BNFL

Lee Poe, Technical Lead, welcomed those in attendance and asked them to introduce themselves. Mr. Poe reviewed the agenda and asked Ed McNamee, WSRC, to present the status of the interim action on the SW Plume.

Mr. McNamee stated that the site had been working on the interim action on the SW Plume for 16 to 18 months and the Focus Group has been in existence for almost a year. He said that ten years ago, the state wanted the site to take action on the SW Plume and consequently put the SW Plume in the Federal Facility Agreement. While there were four plumes, the SW Plume was the most important because it was releasing the most tritium to the creek. One reason the site started talking about an interim action was to be out in front of the permit in the hopes of coming up with a better method to alleviate the problem. Many interim actions were considered. It was finally decided the best alternative would be to install a 15-foot high dam. This dam would allow standing water to exist, driving the water upstream and around the area. This method was presented to the Focus Group and the CAB. At that point, a series of things happened. The 15-foot dam brought on internal concerns as an interim action. At was decided to go with a smaller dam, 5-feet versus 15 feet. The 5-foot dam reduces the concern on the dam collapsing. At this point, in error, the site didn't report back to either the Focus Group or the

ERWM Subcommittee.

In talking with the forest service concerning the construction of the dam, it was suggested that in order to evaporate the tritium from the groundwater quicker, the water could be sprayed on the pine trees located above the dam. By spraying the pine trees, approximately 750 curies/year would be removed from the groundwater, which is about 2500 curies over the time frame of the Environmental Assessment (EA). This appeared to be a good deal and it was included in the EA. However, the site did a bad job on covering the public on the change. Todd Crawford pointed out that the release of tritium to water results in a small dose to few individuals, but when tritium is released to trees, the population dose goes up. Mr. McNamee said that the site was aware of that.

The current interim action makes a large gain in decreasing the tritium level to the stream. However, at the mouth of Fourmile Branch, the tritium level would remain at 126 pico-curies per liter.

Mr. McNamee stated that if approved, construction on the 5-foot dam could be in the late fall or winter. Recirculate wells would be installed by August of next year. Mr. McNamee reviewed the many comparisons of technology that were done to determine if other options worked better.

In answer to various questions, Mr. McNamee stated the following:

- The objective of any remediation would be to reduce the concentration of tritium in the stream to the maximum contaminant limit of 20 pico-curies/milliliter.
- The purpose of the interim action is to move in the direction of meeting the state standard.
- Current technology is not available to meet the state standard of 20 pico-curies/milliliter at the mouth of Fourmile Branch.
- DHEC has agreed that the tritium level at Fourmile Branch is the most important control point versus the level at the seep line.
- The planned interim action does not eliminate the problem, but it does remove one-third of the tritium from the groundwater.
- DHEC may be concerned that in spraying the pine trees, they do not control trees. The site has said they would put the area under the National Emission Standards for Hazardous Air Pollutants (NESHAP) if DHEC would agree.
- 60% of the pollutants that go into Fourmile Branch are from the SW Plume.

Mr. Poe stated that the EA for the interim action on the SW Plume was available for comment. He said comments needed to be in by October 15. Comments should be sent to Jim Moore and Steve Danker, DOE.

Mr. McNamee stated that for the RCRA Permit for the Mixed Waste Management Facility (MWMF), the site expected to receive the permit on September 30. Mr. McNamee said the permit would define the groundwater corrective action in which the site will have to work against. Three copies have been allocated for the Focus Group. The site has 14 calendar days to decide if the site wants to appeal the permit. An appeal would not eliminate the permit; the permit would be replaced with something doable. When the permit is fixed, the site's course is set. Lee Poe stated that the state is obligated to address the comments made by the Focus Group in the RCRA permit. Mr. McNamee stated that an appeal would actually be a notice the site was going to file suit. Therefore, the site would have to pick the grounds for the appeal such as the state was being arbitrary or capricious. Mr. Poe stated that anyone on the Focus Group that wanted a copy of the RCRA Permit should tell Jim Moore. Mr. Poe recommended that everyone look at the Permit and respond as quickly as possible. All comments must be in by October 15.

Mr. Poe stated that everyone should critically review the CAB Recommendation 75 along with the

agency responses. He stated that Mr. McNamee already said that the site had not adequately responded but they needed to review the DHEC response also. Mr. Poe requested comments be sent in by October 5 so he could prepare for the October 7 meeting where the ERWM Subcommittee would be reviewing responses to all recommendations.

Mr. McNamee stated that they had received comments from EPA on the CMS/FS. He stated the most significant comment from EPA was that EPA asked SRS to provide all other regulations that might apply to the ORWBG if the ORWBG did not fall under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Also, there were several other options such as removing the solvent tanks or the material out of the solvent tanks that EPA asked about. Mr. Poe stated that the Focus Group had received the comments from DHEC and would like copies of the EPA comments.

Mr. McNamee reported the status on the Proposed Plan. He said that revision 0 should be available on December 10. The public comment period would be from April 8, 2000 to May 22, 2000. The Record of Decision (ROD) would not be completed until September.

In reviewing the status of the CAB Independent Scientific Peer Review (ISPR), Jim Moore stated that the purchasing request and Statement of Work would be sent to the South Carolina Universities Research and Education Foundation (SCUREF) and Georgia University systems Energy Research and Development Administration (ERDA) by Friday, October 1 with response due back by October 11. Selection of the ISPR would most likely take place on October 14.

Mr. Poe asked the Focus Group their ideas on direction the forward path. Mr. Poe did not feel the Focus Group should wait until the ISPR reported back but should take an active role in the path forward. He referred to the 19 tasks the Focus Group developed in the early stages of the process. A team had started looking at institutional control. He offered to summarize the presentation he gave to the ERWM Subcommittee on institutional control. He suggested that the Focus Group look at what was appropriate for the waste burial ground as to where people would be exposed and the health effect on people. The Land Use Control Assurance Plan (LUCAP) and the October meeting on stewardship at Oak Ridge were just two areas of current involvement on institutional control. After much discussion, it was agreed that they should look at how the National Research Council and the National Regulatory Commission defined institutional control.

Mr. Poe will notify the Focus Group of the next meeting and agenda. With no further comments, Mr. Poe adjourned the meeting.

Meeting handouts may be obtained by calling 1-800-249-8155.